

Objection deadline: December 2, 2019

Hearing date: To Be Determined

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Chapter 15

PERFORADORA ORO NEGRO, S. DE R.L. DE
C.V., *et al.*,

Case No. 18-11094 (SCC)

Debtors.

FERNANDO PEREZ-CORREA IN HIS
CAPACITY AS FOREIGN REPRESENTATIVE
OF PERFORADORA ORO NEGRO, S. DE R.L.
DE C.V., *et al.*,

Adv. Pro. No. 19-01360 (SCC)

Plaintiffs,

V.

ASIA RESEARCH AND CAPITAL
MANAGEMENT LTD., *et al.*,

Defendants.

NOTICE OF SINGAPORE RIG OWNERS' MOTION TO DISMISS

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of the Singapore Rig Owners’ Motion to Dismiss and the pleadings and papers filed in the Chapter 15 case, Defendants Oro Negro Primus, Oro Negro Laurus, Oro Negro Fortius, Oro Negro Decus, and Oro Negro Impetus (together, the “**Singapore Rig Owners**”), by their undersigned counsel, will move (the “**Motion to Dismiss**”), before the Honorable Shelley C. Chapman, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, pursuant to Rules 12(b)(1) and 12(b)(6) of the Federal Rule of Civil Procedure, as incorporated by Rule 7012

of the Federal Rules of Bankruptcy Procedure, for an order, in the form annexed hereto, dismissing the Complaint in the above-captioned adversary proceeding in its entirety and with prejudice.

PLEASE TAKE FURTHER NOTICE that, objections, if any, to the Motion to Dismiss must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules for the United States Bankruptcy Court for the Southern District of New York, and (i) shall be filed with the Bankruptcy Court electronically in accordance with General Order M-399 (General Order M-399 and the User's Manual for the Electronic Case Filing System can be found at <http://www.nysb.uscourts.gov>, the official website for the Bankruptcy Court), by registered users of the Bankruptcy Court's case filing system and, by all other parties in interest, on a CD or flash drive, preferably in Portable Document Format, *i.e.* PDF, WordPerfect, or any other Windows-based word processing format on or before December 2, 2019; and (ii) a hardcopy of such objection or response shall be served, upon (A) the chambers of the Honorable Shelley C. Chapman, One Bowling Green, New York, New York 10004; (B) the undersigned counsel to the Singapore Rig Owners, Dechert LLP, 1095 Avenue of the Americas, New York, New York 10036, Attn: Allan S. Brilliant, Esq. and Shmuel Vasser, Esq., and (C) on all other counsel representing any other defendants, so as to be actually received on or before December 2, 2019.

PLEASE TAKE FURTHER NOTICE that, a hearing on the Motion to Dismiss will be held on a date and time to be scheduled by the Court, at the United States Courthouse, One Bowling Green, New York, New York.

Dated: October 31, 2019
New York, New York

Respectfully submitted,

By: /s/ Shmuel Vasser

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